

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARCUS HILLIARD,	)	
	)	
PLAINTIFF,	)	
	)	Case No. 20-cv-1144
v.	)	
	)	Judge Martha M. Pacold
NATIONAL BOARD OF MEDICAL	)	
EXAMINERS and LOYOLA	)	Magistrate Judge Gabriel A. Fuentes
UNIVERSITY OF CHICAGO,	)	
	)	
DEFENDANTS.	)	

**JOINT MOTION FOR ENTRY OF AMENDED CONFIDENTIALITY ORDER**

Plaintiff MARCUS HILLIARD and Defendant LOYOLA UNIVERSITY OF CHICAGO (“parties”) jointly move for the entry of an Agreed Amended Confidentiality Order. In support thereof the parties state as follows:

1. On August 25, 2022, the parties moved to enter an Agreed Confidentiality Order in order to exchange confidential information relevant to the issues in this litigation. (Dkt No. 66).
2. On August 29, 2022, the Court entered the parties’ Agreed Confidentiality Order. (Dkt. No. 68).
3. The parties now seek to exchange student education records protected by the Family Educational Rights and Privacy Act of 1974 (“FERPA”) and seek to enter an Amended Agreed Confidentiality Order to ensure those records are appropriately safeguarded pursuant to FERPA’s requirements.

WHEREFORE, the parties respectfully request that this Court enter the Agreed Amended Confidentiality Order in the form provided to the Court via its proposed order email.

DATED: September 16, 2022

Respectfully submitted,

By: /s/ Kirsten A. Milton

Kirsten A. Milton  
Julia S. Wolf  
Jackson Lewis P.C.  
150 North Michigan Avenue, Suite 2500  
Chicago, IL 60601  
Tele: (312) 787-4949  
Fax: (312) 787-4995  
Kirsten.Milton@jacksonlewis.com

*Attorney for Loyola University of Chicago*

DATED: September 16, 2022

By: /s/ Cynthia M. Rote

Cynthia Rote  
Integrate Legal PC  
516 Main Street, Suite 1  
Pecatonica, Illinois 61063  
(815) 255-4695  
service@Integrate-Legal.com

*Attorney for Plaintiff Marcus Hilliard*